



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

JUL 31 2019

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Paul Roberts, HR Director
JEGS High Performance
751 E 11th Ave.
Columbus, Ohio 43211

Re: Finding of Violation for Clean Air Act Violations

Dear Mr. Roberts:

The U.S. Environmental Protection Agency is issuing the enclosed Finding of Violation (FOV) to JEGS High Performance (JEGS or you) for violating Section 203(a)(3)(B) of the Clean Air Act (CAA), 42 U.S.C. § 7522(a)(3)(B). As summarized in the attached FOV, EPA has determined that JEGS has sold and/or offered to sell parts or components that bypass, defeat, or render inoperative elements of design of motor vehicles or motor vehicle engines that were installed by the original equipment manufacturer in order to comply with CAA emission standards.

We are offering you an opportunity to confer with us about the violations alleged in the FOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply, and the steps you will take to prevent future violations. In addition, in order to make the conference more productive, we encourage you to submit to us any information responsive to the FOV prior to the conference date.

Please plan for your technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The EPA contact in this matter is Daniel Schaufelberger. You may call him at (312) 886-6814 to request a conference. You should make the request within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

Sincerely,



for Michael D. Harris
Acting Division Director
Enforcement and Compliance Assurance Division

Enclosure

cc: Bob Hodanbosi, Ohio Environmental Protection Agency
William D. Hayes, Attorney, Frost Brown Todd, LLC

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

JEGS High Performance
Columbus, Ohio

Proceedings Pursuant to
The Clean Air Act,
42 U.S.C. §§ 7401–7671q

FINDING OF VIOLATION

EPA-5-19-OH-09

FINDING OF VIOLATION

The U.S. Environmental Protection Agency (EPA) is issuing this Finding of Violation to JEGS High Performance (JEGS) for violating Section 203(a)(3)(B) of the Clean Air Act (CAA), 42 U.S.C. § 7522(a)(3)(B).

Statutory and Regulatory Background

1. Title II of the CAA, 42 U.S.C. §§ 7521–7554, was enacted to reduce air pollution from mobile sources. In enacting the CAA, Congress found, in part, that “the increasing use of motor vehicles . . . has resulted in mounting dangers to the public health and welfare.” Section 101(a)(2) of the CAA, 42 U.S.C. § 7401(a)(2). Congress’s purpose in enacting the CAA included “to protect and enhance the quality of the Nation’s air resources so as to promote the public health and welfare and the productive capacity of its population,” and “to initiate and accelerate a national research and development program to achieve the prevention and control of air pollution.” Section 101(b)(1)–(2) of the CAA, 42 U.S.C. § 7401(b)(1)–(2).
2. Section 216(2) of the CAA, 42 U.S.C. § 7550(2), defines “motor vehicle” as “any self-propelled vehicle designed for transporting persons or property on a street or highway.” *See also* 40 C.F.R. § 85.1703 (further defining “motor vehicle”). These definitions are based on vehicle attributes (e.g., ability to travel over 25 miles per hour, lack of features that render street use unsafe) and make no exemption for vehicles based on their use (e.g., claim that a vehicle is used solely for competition).
3. EPA promulgated emission standards for particulate matter (PM), nitrogen oxides (NO_x), and other pollutants applicable to motor vehicles and motor vehicle engines, under Section 202 of the CAA, 42 U.S.C. § 7521. *See generally* 40 C.F.R. Part 86.
4. Section 203(a)(1) of the CAA, 42 U.S.C. § 7522(a)(1), prohibits a motor vehicle manufacturer from selling a new motor vehicle in the United States unless the motor vehicle is covered by a certificate of conformity. EPA issues certificates of conformity to motor vehicle and motor vehicle engine manufacturers under Section 206(a) of the CAA, 42 U.S.C. § 7525(a), to certify that a particular group of motor vehicles and motor vehicle engines conform to applicable EPA requirements governing motor vehicle emissions. The certificate of conformity will include, among other things, a description

of the motor vehicle engines, their emission control systems, all auxiliary emission control devices and the engine parameters monitored.

5. Motor vehicle and motor vehicle engine manufacturers employ many devices and elements of design to meet emission standards. “Element of design” means “any control system (i.e., computer software, electronic control system, emission control system, computer logic), and/or control system calibrations, and/or the results of systems interaction, and/or hardware items on a motor vehicle or motor vehicle engine.” *See* 40 C.F.R. §§ 86.094-2 and 86.1803-01.
6. To meet the emission standards in 40 C.F.R. Part 86, and qualify for a certificate of conformity, diesel-powered motor vehicle and motor vehicle engine manufacturers may utilize control devices or elements of design such as Diesel Particulate Filter (DPF), Exhaust Gas Recirculation (EGR), Diesel Oxidation Catalyst (DOC), and/or Selective Catalytic Reduction (SCR) systems.
7. Diesel-powered motor vehicle and motor vehicle engine manufacturers may also employ retarded fuel injection timing as a primary element of design to limit emissions of NO_x. *See* 59 Fed. Reg. 23,264 at 23,418 (May 5, 1994) (“[I]njection timing has a very significant impact on NO_x emission rates, with advanced timing settings being associated with higher NO_x . . .”).
8. Modern motor vehicles and engines are equipped with electronic control modules (ECMs). ECMs continuously monitor engine and other operating parameters and control the emission control devices and elements of design, such as the DPF, EGR, SCR systems and the engine fueling strategy.
9. Under Section 202(m) of the CAA, 42 U.S.C. § 7521(m), EPA promulgated regulations for motor vehicles manufactured after 2007 that require motor vehicles to have numerous devices or elements of design that, working together, can detect problems with the vehicle’s emission-related systems, alert drivers to these problems, and store electronically-generated malfunction information. *See* 40 C.F.R. §§ 86.007-17, 86.010-18, and 86.1806-05. These devices or elements of design are referred to as “onboard diagnostic systems” or “OBD” systems.
10. Section 203(a)(3)(B) of the CAA, 42 U.S.C. § 7522(a)(3)(B), makes it unlawful for “any person to manufacture or sell, or offer to sell, or install, any part or component intended for use with, or as part of, any motor vehicle or motor vehicle engine, where a principal effect of the part or component is to bypass, defeat, or render inoperative any device or element of design installed on or in a motor vehicle or motor vehicle engine in compliance with regulations under this subchapter, and where the person knows or should know that such part or component is being offered for sale or installed for such use or put to such use.”

Background

11. JEGS is an aftermarket automotive parts supplier located in Columbus, Ohio.
12. JEGS is a “person,” as that term is defined in Section 302(e) of the CAA, 42 U.S.C. § 7602(e).
13. On December 26, 2018, EPA issued a CAA Section 208 Information Request to JEGS.
14. On March 29, 2019, JEGS submitted a response to EPA’s Information Request. In the response, JEGS provided information showing that between June 1, 2016, and December 26, 2018, JEGS sold or offered for sale at least 2,266 parts or components where a principal effect of each part or component was to remove, disconnect, bypass or disable the engine fueling strategy, and/or the air pollution emission control systems installed on or in motor vehicles and motor vehicle engines in compliance with Title II of the CAA. (See attached table listing the JEGS product number and name).
15. In JEGS’ March 29, 2019 response to EPA’s Information Request, you asserted that a number of the parts and/or components sold or offered for sale by JEGS are “Competition/Race Use Only.”
16. The parts and components sold and offered for sale by JEGS are intended for “motor vehicles” as defined by Section 216(2) of the CAA. There is no “competition/race use only” exemption under the CAA for motor vehicles or motor vehicle engines. “Motor vehicle” is defined as “any self-propelled vehicle designed for transporting persons or property on a street or highway.” CAA § 216(2), 42 U.S.C. § 7550(2); *see also* 40 C.F.R. § 85.1703 (further defining “motor vehicle”). These definitions make no exemption for motor vehicles or motor vehicle engines used for competition.¹ More generally, these definitions are based on vehicle attributes (*e.g.*, ability to travel over 25 miles per hour, lack of features that render street use unsafe) and make no exemption for vehicles based on their use.
17. JEGS knew or should have known that such parts and/or components were being used by its customers to bypass, defeat, or render inoperative the emission controls on motor vehicles certified under the CAA.

Alleged Violations

18. JEGS sold at least 2,266 parts or components where a principal effect of the part or component was to bypass, defeat or render inoperative the engine fueling strategy, DPF, EGR, OBD, and SCR systems and tampering with the emission-related elements of the ECM installed on motor vehicles or motor vehicle engines, in violation of Section 203(a)(3)(B) of the CAA, 42 U.S.C. § 7522(a)(3)(B).

¹ In contrast, the CAA exempts from the definition of “nonroad vehicle” and “nonroad engine” those vehicles and engines used solely for competition. CAA § 216(10)–(11), 42 U.S.C. § 7550(10)–(11). EPA has implemented regulations describing how to exempt from CAA requirements nonroad vehicles and engines used solely for competition. 40 C.F.R. § 1068.235. These regulations explicitly do not apply to motor vehicles and motor vehicle engines. 40 C.F.R. § 85.1701(a)(1).

Environmental Impact of Violations

19. These violations may result in excess emissions of PM, NO_x, hydrocarbons, and other air pollutants and contribute to increased ground level ozone concentrations. PM, especially fine particulates containing microscopic solids or liquid droplets, can get deep into the lungs and cause serious health problems, including decreased lung function; chronic bronchitis; and aggravated asthma. Additionally, current scientific evidence links short-term NO_x exposures, ranging from 30 minutes to 24 hours, with adverse respiratory effects including airway inflammation in healthy people and increased respiratory symptoms in people with asthma. Exposure to ground-level ozone can also reduce lung function and inflame lung tissue; repeated exposure may permanently scar lung tissue.

Enforcement Authority

20. The EPA may bring an enforcement action for these violations under its administrative authority or by referring this matter to the United States Department of Justice with a recommendation that a civil complaint be filed in federal district court. CAA §§ 204 and 205, 42 U.S.C. §§ 7523 and 7524. Persons violating Section 203(a)(3) of the CAA, 42 U.S.C. § 7522(a)(3), are subject to an injunction under Section 204 of the CAA, 42 U.S.C. § 7523, and a civil penalty of up to \$4,735 for each violation. CAA § 205(a), 42 U.S.C. § 7524(a); 40 C.F.R. § 19.4.

Date

7/13/19

for



Michael D. Harris
Acting Division Director
Enforcement and Compliance Assurance
Division

Attachment

JEGS Products Alleged to be Violating the CAA

JEGS PRODUCT NUMBER	PRODUCT NAME	PRODUCT MANUFACTURER
46521	ECM TUNER CAT	Bully Dog, Derive Systems
40420	TRIPLE DOG GT DIESEL TUNR	Bully Dog, Derive Systems
40460B	GTX TUNER/MONITOR	Bully Dog, Derive Systems
40470	BDX GAS/DIESEL TUNER	Bully Dog, Derive Systems
41101	FLIP CHIP 94-97 7.3 AUTO	Bully Dog, Derive Systems
41103	6-POS 4-B 99-99.5 AUT W/S	Bully Dog, Derive Systems
41104	COMPUTER CHIP	Bully Dog, Derive Systems
41105	6-POS 4-B 99.5-01 AUT W/S	Bully Dog, Derive Systems
41107	6-POS 4-B 99.5-01 MAN W/S	Bully Dog, Derive Systems
41108	6-POS 4-BNK 02-03 AUT W/S	Bully Dog, Derive Systems
46500	HEAVY-DUTY GAUGE TUNER	Bully Dog, Derive Systems
46501	HEAVY-DUTY WATCHDOG TUNER	Bully Dog, Derive Systems
46511	ECM TUNER CUMMINS	Bully Dog, Derive Systems
46531	ECM TUNER DETROIT DIESEL	Bully Dog, Derive Systems
46541	ECM TUNER PACCAR	Bully Dog, Derive Systems
4015	ITSX/TSX ANDROID FORD	SCT, Derive Systems
40460S	GTX TUNER/MONITOR	SCT, Derive Systems
40490	BDX GAS/DIESEL PROGRAMMER	SCT, Derive Systems
4332	ADVANTAGE III FORD PRO	SCT, Derive Systems
4416	ITSX/TSX ANDROID GM	SCT, Derive Systems
5015P	LIVEWIRE TS PLUS FORD	SCT, Derive Systems
6600	4-BANK E-PROM CHIP	SCT, Derive Systems
7015	X4 PWERFLASH PRGMR FORD	SCT, Derive Systems
7416	X4 PWERFLASH PRGMR GM	SCT, Derive Systems
7500	4-BANK CHIP BURNER	SCT, Derive Systems
BA-2600	MASS AIR METER 90MM FORD	SCT, Derive Systems
BA-3000	MASS AIR METER 90MM FORD	SCT, Derive Systems
BA-5000	MASS AIR METER FORD	SCT, Derive Systems
1515932	ELECTRONIC BOOST BUILDER	BD Diesel Performance
1515935	ELECTRONIC BOOST BUILDER	BD Diesel Performance
1515936	ELECTRONIC BOOST BUILDER	BD Diesel Performance
1515937	ELECTRONIC BOOST BUILDER	BD Diesel Performance
1516000	ELECTRONIC BOOST BUILDER	BD Diesel Performance
MADJ06	SMARTY JR PROGRAMMER	BD Diesel Performance

MADS03	SMARTY PROGRAMMER	BD Diesel Performance
MADS06POD	SMARTY PROGRAMMER 5.9L	BD Diesel Performance
11242	THERMOMASTER CHIP	Hypertech, Inc.
11291	STREET RUNNER CHIP	Hypertech, Inc.
11361	STREET RUNNER CHIP	Hypertech, Inc.
11381	STREET RUNNER CHIP	Hypertech, Inc.
11401	STREET RUNNER CHIP	Hypertech, Inc.
11412	THERMOMASTER CHIP	Hypertech, Inc.
11541	STREET RUNNER CHIP	Hypertech, Inc.
11542	THERMOMASTER CHIP	Hypertech, Inc.
11551	STREET RUNNER CHIP	Hypertech, Inc.
11572	THERMOMASTER CHIP	Hypertech, Inc.
11602	THERMOMASTER CHIP	Hypertech, Inc.
11721	STREET RUNNER CHIP	Hypertech, Inc.
11761	STREET RUNNER CHIP	Hypertech, Inc.
120011	STREET RUNNER CHIP	Hypertech, Inc.
120012	THERMOMASTER CHIP	Hypertech, Inc.
120021	STREET RUNNER CHIP	Hypertech, Inc.
120022	THERMOMASTER CHIP	Hypertech, Inc.
120032	THERMOMASTER CHIP	Hypertech, Inc.
120071	STREET RUNNER CHIP	Hypertech, Inc.
120072	THERMOMASTER CHIP	Hypertech, Inc.
120081	STREET RUNNER CHIP	Hypertech, Inc.
120121	STREET RUNNER CHIP	Hypertech, Inc.
120131	STREET RUNNER CHIP	Hypertech, Inc.
120232	THERMOMASTER CHIP	Hypertech, Inc.
120241	STREET RUNNER CHIP	Hypertech, Inc.
120242	THERMOMASTER CHIP	Hypertech, Inc.
120342	THERMOMASTER CHIP	Hypertech, Inc.
120352	THERMOMASTER CHIP	Hypertech, Inc.
120361	STREET RUNNER CHIP	Hypertech, Inc.
120362	THERMOMASTER CHIP	Hypertech, Inc.
120381	STREET RUNNER CHIP	Hypertech, Inc.
120382	THERMOMASTER CHIP	Hypertech, Inc.
120392	THERMOMASTER CHIP	Hypertech, Inc.
120462	THERMOMASTER CHIP	Hypertech, Inc.
120542	THERMOMASTER CHIP	Hypertech, Inc.
12061	STREET RUNNER CHIP	Hypertech, Inc.
121052	THERMOMASTER CHIP	Hypertech, Inc.
121091	STREET RUNNER CHIP	Hypertech, Inc.

121152	THERMOMASTER CHIP	Hypertech, Inc.
121181	STREET RUNNER CHIP	Hypertech, Inc.
121221	STREET RUNNER CHIP	Hypertech, Inc.
121321	STREET RUNNER CHIP	Hypertech, Inc.
121341	STREET RUNNER CHIP	Hypertech, Inc.
121361	STREET RUNNER CHIP	Hypertech, Inc.
121372	THERMOMASTER CHIP	Hypertech, Inc.
121381	STREET RUNNER CHIP	Hypertech, Inc.
121382	THERMOMASTER CHIP	Hypertech, Inc.
121391	STREET RUNNER CHIP	Hypertech, Inc.
121451	STREET RUNNER CHIP	Hypertech, Inc.
121461	STREET RUNNER CHIP	Hypertech, Inc.
121541	STREET RUNNER CHIP	Hypertech, Inc.
122021	STREET RUNNER CHIP	Hypertech, Inc.
122061	STREET RUNNER CHIP	Hypertech, Inc.
122081	STREET RUNNER CHIP	Hypertech, Inc.
122092	THERMOMASTER CHIP	Hypertech, Inc.
122101	STREET RUNNER CHIP	Hypertech, Inc.
122121	STREET RUNNER CHIP	Hypertech, Inc.
122122	THERMOMASTER CHIP	Hypertech, Inc.
122151	STREET RUNNER CHIP	Hypertech, Inc.
122221	STREET RUNNER CHIP	Hypertech, Inc.
122251	STREET RUNNER CHIP	Hypertech, Inc.
122342	THERMOMASTER CHIP	Hypertech, Inc.
122351	STREET RUNNER CHIP	Hypertech, Inc.
122362	THERMOMASTER CHIP	Hypertech, Inc.
122382	THERMOMASTER CHIP	Hypertech, Inc.
122392	THERMOMASTER CHIP	Hypertech, Inc.
122461	STREET RUNNER CHIP	Hypertech, Inc.
122572	THERMOMASTER CHIP	Hypertech, Inc.
123011	STREET RUNNER CHIP	Hypertech, Inc.
123032	THERMOMASTER CHIP	Hypertech, Inc.
123041	STREET RUNNER CHIP	Hypertech, Inc.
123151	STREET RUNNER CHIP	Hypertech, Inc.
123222	THERMOMASTER CHIP	Hypertech, Inc.
123251	STREET RUNNER CHIP	Hypertech, Inc.
123291	STREET RUNNER CHIP	Hypertech, Inc.
123392	THERMOMASTER CHIP	Hypertech, Inc.
123401	STREET RUNNER CHIP	Hypertech, Inc.
124012	THERMOMASTER CHIP	Hypertech, Inc.

124081	STREET RUNNER CHIP	Hypertech, Inc.
124121	STREET RUNNER CHIP	Hypertech, Inc.
124152	THERMOMASTER CHIP	Hypertech, Inc.
124221	STREET RUNNER CHIP	Hypertech, Inc.
124222	THERMOMASTER CHIP	Hypertech, Inc.
124241	STREET RUNNER CHIP	Hypertech, Inc.
126001	STREET RUNNER CHIP	Hypertech, Inc.
126012	THERMOMASTER CHIP	Hypertech, Inc.
126021	STREET RUNNER CHIP	Hypertech, Inc.
126032	THERMOMASTER CHIP	Hypertech, Inc.
126062	THERMOMASTER CHIP	Hypertech, Inc.
127031	STREET RUNNER CHIP	Hypertech, Inc.
127041	STREET RUNNER CHIP	Hypertech, Inc.
127061	STREET RUNNER CHIP	Hypertech, Inc.
127062	THERMOMASTER CHIP	Hypertech, Inc.
127071	STREET RUNNER CHIP	Hypertech, Inc.
127072	THERMOMASTER CHIP	Hypertech, Inc.
127081	STREET RUNNER CHIP	Hypertech, Inc.
127102	THERMOMASTER CHIP	Hypertech, Inc.
127131	STREET RUNNER CHIP	Hypertech, Inc.
127141	STREET RUNNER CHIP	Hypertech, Inc.
128031	STREET RUNNER CHIP	Hypertech, Inc.
128032	THERMOMASTER CHIP	Hypertech, Inc.
128082	THERMOMASTER CHIP	Hypertech, Inc.
128101	STREET RUNNER CHIP	Hypertech, Inc.
128191	STREET RUNNER CHIP	Hypertech, Inc.
128192	THERMOMASTER CHIP	Hypertech, Inc.
128821	STREET RUNNER CHIP	Hypertech, Inc.
128822	THERMOMASTER CHIP	Hypertech, Inc.
128851	STREET RUNNER CHIP	Hypertech, Inc.
128872	THERMOMASTER CHIP	Hypertech, Inc.
128881	STREET RUNNER CHIP	Hypertech, Inc.
128882	THERMOMASTER CHIP	Hypertech, Inc.
128891	STREET RUNNER CHIP	Hypertech, Inc.
128892	THERMOMASTER CHIP	Hypertech, Inc.
128921	STREET RUNNER CHIP	Hypertech, Inc.
128941	STREET RUNNER CHIP	Hypertech, Inc.
128981	STREET RUNNER CHIP	Hypertech, Inc.
128982	THERMOMASTER CHIP	Hypertech, Inc.
128992	THERMOMASTER CHIP	Hypertech, Inc.

129101	STREET RUNNER CHIP	Hypertech, Inc.
129102	THERMOMASTER CHIP	Hypertech, Inc.
129111	STREET RUNNER CHIP	Hypertech, Inc.
129132	THERMOMASTER CHIP	Hypertech, Inc.
129141	STREET RUNNER CHIP	Hypertech, Inc.
129171	STREET RUNNER CHIP	Hypertech, Inc.
150301	STREET RUNNER CHIP	Hypertech, Inc.
151302	THERMOMASTER CHIP	Hypertech, Inc.
151371	STREET RUNNER CHIP	Hypertech, Inc.
21601	STREET RUNNER CHIP	Hypertech, Inc.
2200	MAX ENERGY 2.0 JEEP JK	Hypertech, Inc.
226112	THERMOMASTER CHIP	Hypertech, Inc.
227042	THERMOMASTER CHIP	Hypertech, Inc.
30027	POWER PROGRAMER GM	Hypertech, Inc.
31291	STREET RUNNER CHIP	Hypertech, Inc.
31371	STREET RUNNER CHIP	Hypertech, Inc.
325011	STREET RUNNER CHIP	Hypertech, Inc.
351721	THERMOMASTER CHIP	Hypertech, Inc.
351751	STREET RUNNER CHIP	Hypertech, Inc.
351752	THERMOMASTER CHIP	Hypertech, Inc.
351772	THERMOMASTER CHIP	Hypertech, Inc.
351791	STREET RUNNER CHIP	Hypertech, Inc.
351792	THERMOMASTER CHIP	Hypertech, Inc.
352821	STREET RUNNER CHIP	Hypertech, Inc.
352831	STREET RUNNER CHIP	Hypertech, Inc.
354832	THERMOMASTER CHIP	Hypertech, Inc.
358781	STREET RUNNER CHIP	Hypertech, Inc.
41371	STREET RUNNER CHIP	Hypertech, Inc.
41372	THERMOMASTER CHIP	Hypertech, Inc.
52502	MAX ENERGY TUNER MOPAR	Hypertech, Inc.
52503	MAX ENERGY TUNER MOPAR	Hypertech, Inc.
705002	INTERCEPTOR TUNER MOPAR	Hypertech, Inc.
705003	INTERCEPTOR TUNER JEEP	Hypertech, Inc.
83004	HYPERPAC GM	Hypertech, Inc.
30-0310	X-SER UEGO AFR CONTROLLER	AEM Performance Electronics
30-0310N	X-SERIES INLINE	AEM Performance Electronics
30-1930	F/IC-8	AEM Performance Electronics
30-1960	FUEL/IGN COMPUTER SCION	AEM Performance Electronics
30-7108	INFINITY 508 ENGINE MGMNT	AEM Performance Electronics
30-7109	INFINITY 708 E46/PORSCHE	AEM Performance Electronics

30-7113	INFINITY 308	AEM Performance Electronics
46-90071	EGR COOLER DELETE SYSTEM	aFe Performance
46-90072	EGR COOLER DELETE SYSTEM	aFe Performance
46-90076	EGR TRACK KIT FORD DSL TR	aFe Performance
77-42004	TUNER MODULE DODGE DSL	aFe Performance
77-43007	TUN MODULE FORD F-150 ECO	aFe Performance
77-44004	TUNER MODULE GM DSL	aFe Performance
77-44010	SCORCHER MODULE 2017 DURA	aFe Performance
61022	6-GUN TUNR W/S 03-5 DODGE	Gale Banks Engineering
61023	6-GUN TUNR W/S 03-07 FORD	Gale Banks Engineering
61148	BANKS IQ-MAN-MACHINE INTE	Gale Banks Engineering
61156	IQ DASH BOARD PC	Gale Banks Engineering
61204	IDASH 4.3 LATE OBDII EQ	Gale Banks Engineering
62783	BIG HOSS DIESEL TUNER 200	Gale Banks Engineering
62856	SIX GUN MODULE FORD 6.0L	Gale Banks Engineering
66051	AUTOMIND PROGRAMMER - 01-	Gale Banks Engineering
66110	AUTOMIND PROGAMMER FORD	Gale Banks Engineering
66112	AUTOMIND PROGRAMMER GM	Gale Banks Engineering
66410	AUTOMIND 2 PROGRAMMER HA	Gale Banks Engineering
66411	AUTOMIND 2 PROGRAMMER HA	Gale Banks Engineering
66413	AUTOMIND 2 PROGRAMMER HA	Gale Banks Engineering
66505	BIG HOSS MODULE BLANK 199	Gale Banks Engineering
66517	BANKS BULLET NON-EGT 2001	Gale Banks Engineering
BX600016FS	BOOSTMAX TURBO BOOSTER	JMS Chip & Performance
BX60002016	BOOSTMAX TURBO BOOSTER	JMS Chip & Performance
BX600023	BOOSTMAX TURBO BOOSTER	JMS Chip & Performance
BX600027	BOOSTMAX TURBO BOOSTER	JMS Chip & Performance
BX600035	BOOSTMAX TURBO BOOSTER	JMS Chip & Performance
BX600035V2	BOOSTMAX TURBO BOOSTER	JMS Chip & Performance
BX600035V3	BOOSTMAX TURBO BOOSTER	JMS Chip & Performance
7045	PREDATOR 2 PRO CUSTM TUNR	DiabloSport, LLC
7103	PREDATOR 2 FORD DIESEL	DiabloSport, LLC
7120	PREDATOR 2 FORD F150 PLAT	DiabloSport, LLC
7203	PREDATOR 2 GM DIESEL TRCK	DiabloSport, LLC
7210	PREDATOR 2 PLAT	DiabloSport, LLC
7310	P2 DODGE CHALLENGER	DiabloSport, LLC
8145	INTUNE I3 PRGMR RACE FORD	DiabloSport, LLC
8245	INTUNE I3 PRGMR RACE GM	DiabloSport, LLC
8320-R	INTUNE I3 PRGMR RACE CHAR	DiabloSport, LLC

8345	INTUNE I3 PRGMR RACE CHRY	DiabloSport, LLC
8445-1	INTUNE I3 PRGMR RACE JEEP	DiabloSport, LLC
9145	TRINITY T2 EX PLAT FORD	DiabloSport, LLC
9245	TRINITY T2 EX PLAT GM	DiabloSport, LLC
9320-R	TRINITY T2 EX PLAT CHARGR	DiabloSport, LLC
9321-R	TRINITY T2 EX PLAT RAM V8	DiabloSport, LLC
9345	TRINITY T2 EX PLAT CHRYSL	DiabloSport, LLC
I-1000	IN-TUNE PROGRAMMER	DiabloSport, LLC
I2010	INTUNE I2 PROGRAMMER CHRY	DiabloSport, LLC
I2012	INTUNE I2 PROGRAMMER JEEP	DiabloSport, LLC
I2020	INTUNE I2 PROGRAMMER FORD	DiabloSport, LLC
M1000	POWER PUCK INTERNATIONAL	DiabloSport, LLC
M1000X	MARATHON MODULE	DiabloSport, LLC
P1000	POWER PUCK 5.9L CUMMINS	DiabloSport, LLC
P1030	POWER PUCK LIBERTY CRD	DiabloSport, LLC
P1040	POWER PUCK 6.7L CUMMINS	DiabloSport, LLC
P1050	POWER PUCK MOPAR 3.0L V6	DiabloSport, LLC
P3020	POWER PUCK 6.4L POWERSTRK	DiabloSport, LLC
P3030	POWERPUCK	DiabloSport, LLC
P4000	POWER PUCK MERCEDES 3.0L	DiabloSport, LLC
PCM-CHALV815	MOD PCM 15 CHALLENGR HEMI	DiabloSport, LLC
PCM-CHALV816	MOD PCM 16 CHALLENGR HEMI	DiabloSport, LLC
PCM-CHALV817	MOD PCM 17 CHALLENGR HEMI	DiabloSport, LLC
PCM-CHARV816	MOD PCM 16 CHARGER HEMI	DiabloSport, LLC
PCM-CHARV817	MOD PCM 17 CHARGER HEMI	DiabloSport, LLC
PCM-DR578S17	MOD PCM 17 RAM 5.7L 8-SPD	DiabloSport, LLC
S1000	SPRINT ACTIVE F/MANG MODU	DiabloSport, LLC
T-1000	TRINITY PROGRAM/MONITOR	DiabloSport, LLC
14001	REVOLVER FORD 7.3L 95-97	Edge Products
14004	REVOLVER FORD 7.3L 1999	Edge Products
16040	EVO HT2 FORD GAS/DIESEL	Edge Products
21503	JUICE ATTITUDE 07.5-10 GM	Edge Products
30300HOT	COMP MODULE DODGE	Edge Products
31501	JUICE ATTITUDE 01-02 5.9L	Edge Products
31502	JUICE ATTITUDE 03-04 305	Edge Products
85301	CS2 EVO TUNER DIESEL CARB	Edge Products
85400	EVOLUTION CTS2 DIESEL TRK	Edge Products
85450	EVOLUTION CTS2 GAS	Edge Products
14005	DYNAMIC SPECTRUM TUNER	JET Performance
17008	SPEEDO-PRO PROGRAMMER	JET Performance

CERTIFICATE OF MAILING

I certify that I sent a Finding of Violation, No. EPA-5-19-OH-09, by Certified Mail, Return Receipt Requested, to:

Paul Roberts, HR Director
JEGS High Performance
751 E 11th Ave.
Columbus, Ohio 43211

I also certify that I sent a Finding of Violation, by e-mail to:

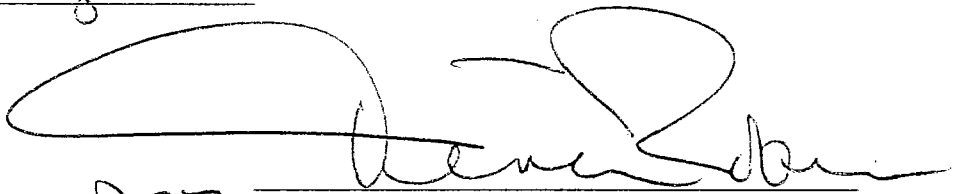
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On the 1st day of August 2019.


Don
Kathy Jones
Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 70181830000054146332